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**VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

May 21, 2014

Paul Boghossian, President
Ari Aleong, Director, Product Quality
Armorcast Products Company, Inc.
13230 Saticoy Street
North Hollywood, CA 91605

**Re: Notice of Violations and Intent to File Suit Under the Federal Water
Pollution Control Act**

Dear Mr. Boghossian and Mr. Aleong:

I am writing on behalf of California Communities Against Toxics ("CCAT") in regard to violations of the Federal Water Pollution Control Act (the "Clean Water Act" or "Act") that CCAT believes are occurring at Armorcast Products Company, Inc.'s industrial facility located at 13230 Saticoy Street in North Hollywood, California ("Facility"). CCAT is a non-profit public benefit corporation dedicated to working with communities to advocate for environmental justice and pollution prevention. CCAT has members living in the community adjacent to the Facility and the Los Angeles River Watershed. CCAT and its members are deeply concerned with protecting the environment in and around their communities, including the Los Angeles River Watershed. This letter is being sent to you as the responsible owners, officers, or operators of the Facility (all recipients are hereinafter collectively referred to as "Armorcast").

This letter addresses Armorcast's unlawful discharge of pollutants from the Facility through the Los Angeles County municipal storm sewer system through Tujunga Wash into the Los Angeles River. The Facility is discharging storm water pursuant to National Pollutant Discharge Elimination System ("NPDES") Permit No. CA S000001, State Water Resources Control Board ("State Board") Order No. 92-12-DWQ as amended by Order No. 97-03-DWQ (hereinafter "General Permit").¹ The WDID identification number for the Facility listed on

¹ On April 1, 2014, the State Board reissued the General Permit, continuing its mandate that industrial facilities implement the best available technology economically achievable ("BAT")

documents submitted to the Regional Water Quality Control Board, Los Angeles Region ("Regional Board") is 4 19I021682. The Facility is engaged in ongoing violations of the substantive and procedural requirements of the General Permit.

Section 505(b) of the Clean Water Act requires a citizen to give notice of intent to file suit sixty (60) days prior to the initiation of a civil action under Section 505(a) of the Act (33 U.S.C. § 1365(a)). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA") and the State in which the violations occur.

As required by the Clean Water Act, this Notice of Violation and Intent to File Suit provides notice of the violations that have occurred, and continue to occur, at the Facility. Consequently, Armorcast is hereby placed on formal notice by CCAT that, after the expiration of sixty days from the date of this Notice of Violations and Intent to Sue, CCAT intends to file suit in federal court against Armorcast under Section 505(a) of the Clean Water Act (33 U.S.C. § 1365(a)), for violations of the Clean Water Act and the General Permit. These violations are described more extensively below.

I. Background.

On approximately July 8, 2008, Armorcast filed a Notice of Intent to Comply With the Terms of the General Permit to Discharge Storm Water Associated with Industrial Activity ("NOI"). In its NOI and Annual Reports, Armorcast has certified that the Facility is classified under SIC Code 3089 ("Plastics Products Not Elsewhere Specified"). The Facility collects and discharges storm water from its 5.02-acre industrial site into at least one storm drain outfall located at the Facility. On information and belief, CCAT alleges that industrial activities at the site include the manufacture of composite and polymer concrete utility boxes and covers, using various manufacturing processes such as fiber-reinforced spray-up, compression, and cast molding. Raw materials including fiberglass, polyester resin, silica sand, and limestone are used in these manufacturing processes, and molds and rusty racks are stored outdoors. On information and belief, CCAT alleges that storm water discharges from the Facility contain storm water that is commingled with runoff from the Facility from areas where industrial processes occur and/or where materials are stored. The outfalls discharge into Los Angeles County's municipal storm sewer system, which discharges into the Tujunga Wash, which flows into the Los Angeles River.

The Regional Board has identified beneficial uses of the Los Angeles River, including its tributary, Tujunga Wash, and established water quality standards for it in the "Water Quality Control Plan – Los Angeles Region: Basin Plan for the Coastal Watersheds of Los Angeles and

and best conventional pollutant control technology ("BCT") and, in addition, establishing numeric action levels mandating additional pollution control efforts. State Board Order 2014-0057-DWQ. The new permit, however, does not go into effect until July 1, 2015. Until that time, the current General Permit remains in full force and effect.

Ventura Counties", generally referred to as the Basin Plan. *See* http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/basin_plan_documentation.shtml. The beneficial uses of these waters include, among others, municipal and domestic supply, groundwater recharge, water contact recreation, non-contact water recreation, warm freshwater habitat, wildlife habitat, and wetland habitat. The non-contact water recreation use is defined as "[u]ses of water for recreational activities involving proximity to water, but not normally involving contact with water where water ingestion is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities." *Id.* at 2-2. Contact recreation use includes fishing and wading. *Id.* Visible pollution, including visible sheens and cloudy or muddy water from industrial areas, impairs people's use of the Los Angeles River for contact and non-contact water recreation and commercial and sport fishing.

The Basin Plan includes a narrative toxicity standard which states that "[a]ll waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant, animal, or aquatic life." *Id.* at 3-16. The Basin Plan includes a narrative oil and grease standard which states that "[w]aters shall not contain oils, greases, waxes, or other materials in concentrations that result in a visible film or coating on the surface of the water or on objects in the water, that cause nuisance, or that otherwise adversely affect beneficial uses." *Id.* at 3-11. The Basin Plan provides that "[w]aters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses." *Id.* at 3-16. The Basin Plan provides that "[t]he pH of bays or estuaries [or inland surface waters] shall not be depressed below 6.5 or raised above 8.5 as a result of waste discharges." *Id.* at 3-15. The Basin Plan provides that "[s]urface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use." *Id.* at 3-8. The Basin Plan provides that "[w]aters shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses." *Id.* at 3-9. The Basin Plan provides that "[w]aters shall be free of coloration that causes nuisance or adversely affects beneficial uses." *Id.* The Basin Plan provides that "[w]aters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses." *Id.* at 3-17. The Basin Plan provides that "[w]aters shall not contain taste or odor-producing substances in concentrations that impart undesirable tastes or odors to fish flesh or other edible aquatic resources, cause nuisance, or adversely affect beneficial uses." *Id.* at 3-16.

The Effluent Limitations of the General Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable ("BAT") for toxic pollutants and best conventional pollutant control technology ("BCT") for conventional pollutants. *See* General Permit, Order Part B(3). The EPA has published Benchmark values set at the maximum

pollutant concentration present if an industrial facility is employing BAT and BCT.² The following benchmarks have been established for pollutants discharged by Armorcast: pH – 6.0 - 9.0 standard units (“s.u.”); total suspended solids (“TSS”) – 100 mg/L; oil and grease (“O&G”) – 15 mg/L; and iron – 1.0 mg/L.

II. Alleged Violations of the Clean Water Act and the General Permit.

A. Discharges in Violation of the Permit not Subjected to BAT/BCT

Armorcast has violated and continues to violate the terms and conditions of the General Permit. Section 402(p) of the Act prohibits the discharge of storm water associated with industrial activities, except as permitted under an NPDES permit (33 U.S.C. § 1342) such as the General Permit. The General Permit prohibits any discharges of storm water associated with industrial activities or authorized non-storm water discharges that have not been subjected to BAT or BCT. Effluent Limitation B(3) of the General Permit requires dischargers to reduce or prevent pollutants in their storm water discharges through implementation of BAT for toxic and nonconventional pollutants and BCT for conventional pollutants. BAT and BCT include both nonstructural and structural measures. General Permit, Section A(8). Conventional pollutants are TSS, O&G, pH, biochemical oxygen demand, and fecal coliform. 40 C.F.R. § 401.16. All other pollutants are either toxic or nonconventional. *Id.*; 40 C.F.R. § 401.15.

In addition, Discharge Prohibition A(1) of the General Permit prohibits the discharge of materials other than storm water (defined as non-storm water discharges) that discharge either directly or indirectly to waters of the United States. Discharge Prohibition A(2) of the General Permit prohibits storm water discharges and authorized non-storm water discharges that cause or threaten to cause pollution, contamination, or nuisance.

Receiving Water Limitation C(1) of the General Permit prohibits storm water discharges and authorized non-storm water discharges to surface or groundwater that adversely impact human health or the environment. Receiving Water Limitation C(2) of the General Permit also prohibits storm water discharges and authorized non-storm water discharges that cause or contribute to an exceedance of any applicable water quality standards contained in a Statewide Water Quality Control Plan or the applicable Regional Board’s Basin Plan. The General Permit does not authorize the application of any mixing zones for complying with Receiving Water Limitation C(2). As a result, compliance with this provision is measured at the Facility’s discharge monitoring locations.

Armorcast has discharged and continues to discharge storm water with unacceptable levels of TSS, O&G, and iron in violation of the General Permit. Armorcast’s sampling and analysis results reported to the Regional Board confirm discharges of specific pollutants and

² The Benchmark Values can be found at:

http://www.epa.gov/npdes/pubs/msgp2008_finalpermit.pdf and

<http://cwea.org/p3s/documents/multi-sectorrev.pdf> (Last accessed on April 17, 2014).

materials other than storm water in violation of the Permit provisions listed above. Self-monitoring reports under the Permit are deemed “conclusive evidence of an exceedance of a permit limitation.” *Sierra Club v. Union Oil*, 813 F.2d 1480, 1493 (9th Cir. 1988).

The following observations of pollutants from the Facility have violated narrative water quality standards established in the Basin Plan and have thus violated Discharge Prohibition A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Permit.

Date	Parameter	Observed Conditions	Basin Plan Water Quality Standard	Outfall (as identified by the Facility)
1/24/2013	Narrative	Discoloration / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-17	Storm Drain #1
11/29/2012	Narrative	Discoloration / Odors / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-16 Basin Plan at 3-17	Storm Drain #1
4/11/2012	Narrative	Discoloration / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-17	Storm Drain #1
2/15/2012	Narrative	Discoloration / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-17	Storm Drain #1
2/18/2011	Narrative	Discoloration / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-17	Storm Drain #1
1/3/2011	Narrative	Discoloration / Floating & Suspended Materials / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-16 Basin Plan at 3-17	Storm Drain #1
10/6/2010	Narrative	Discoloration / Floating & Suspended Materials / Odors / Turbidity	Basin Plan at 3-9 / Basin Plan at 3-16 Basin Plan at 3-17	Storm Drain #1
12/11/2009	Narrative	Discoloration	Basin Plan at 3-9	Storm Drain #1
11/30/2009	Narrative	Discoloration	Basin Plan at 3	Storm Drain #1
10/13/2009	Narrative	Discoloration	Basin Plan at 3	Storm Drain #1

The information in the above table reflects data gathered from Armorcast’s self-monitoring during the 2009-2010, 2010-2011, 2011-2012, and 2012-2013 wet seasons. CCAT alleges that during each of those wet seasons and continuing through today, Armorcast has discharged storm water contaminated with pollutants that violate one or more applicable narrative water quality standards, including but not limited to each of the following:

- Suspended materials – waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial uses

- Discoloration – waters shall be free of coloration that causes nuisance or adversely affects beneficial uses
- Floating materials – waters shall not contain floating materials, including solids, liquids, foams, and scum, in concentrations that cause nuisance or adversely affect beneficial uses
- Odor - waters shall not contain taste or odor-producing substances in concentrations that impart undesirable tastes or odors to fish flesh or other edible aquatic resources, cause nuisance, or adversely affect beneficial uses
- Turbidity - waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses

The following discharges of pollutants from the Facility have violated Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) and are evidence of ongoing violations of Effluent Limitation B(3) of the General Permit.

Date	Parameter	Observed Concentration	EPA Benchmark Value	Location (as identified by the Facility)
2/19/2013	Total Suspended Solids	414 mg/L	100 mg/L	Storm Drain #1 (South)
11/29/2012	Total Suspended Solids	152 mg/L	100 mg/L	Storm Drain #1 (South)
11/29/2012	Oil & Grease	87.5 mg/L	15 mg/L	Storm Drain #1 (South)
11/29/2012	Iron	3.69 mg/L	1.0 mg/L	Storm Drain #1 (South)
2/15/2012	Total Suspended Solids	972 mg/L	100 mg/L	Storm Drain #1 (South)
2/15/2012	Oil & Grease	160 mg/L	15 mg/L	Storm Drain #1 (South)
12/11/2009	Total Suspended Solids	357 mg/L	100 mg/L	Storm Drain #1 (South)

The information in the above table reflects data gathered from Armorcast's self-monitoring during the 2009-2010, 2010-2011, 2011-2012, and 2012-2013 wet seasons. CCAT alleges that during each of those rainy seasons and continuing through today, Armorcast has discharged storm water contaminated with pollutants at levels that exceed one or more applicable EPA Benchmarks, including but not limited to each of the following:

- Total Suspended Solids – 100 mg/L
- Oil & Grease – 15.0 mg/L
- Iron – 1.0 mg/L

CCAT's investigation, including its review of Armorcast's analytical results documenting pollutant levels in the Facility's storm water discharges well in excess of applicable water quality standards and EPA's benchmark values, indicates that Armorcast has not implemented BAT and BCT at the Facility for its discharges of TSS, O&G, and iron in violation of Effluent Limitation B(3) of the General Permit. Armorcast was required to have implemented BAT and BCT by no later than October 1, 1992, or since the date the Facility opened. Thus, Armorcast is discharging polluted storm water associated with its industrial operations without having implemented BAT and BCT.

In addition, the numbers listed in the tables above indicate that the Facility is discharging polluted storm water in violation of Discharge Prohibitions A(1) and A(2) and Receiving Water Limitations C(1) and C(2) of the General Permit. CCAT alleges that such violations also have occurred and will occur on other rain dates, including every significant rain event that has occurred since May 21, 2009, and that will occur at the Facility subsequent to the date of this Notice of Violation and Intent to File Suit. Attachment A, attached hereto, sets forth each of the specific rain dates on which CCAT alleges that Armorcast has discharged storm water containing impermissible levels of TSS, O&G, and iron in violation of Effluent Limitation B(3), Discharge Prohibitions A(1) and A(2), and Receiving Water Limitations C(1) and C(2) of the General Permit.³

These unlawful discharges from the Facility are ongoing. Each discharge of storm water containing any of these pollutants constitutes a separate violation of the General Permit and the Act. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Armorcast is subject to penalties for violations of the General Permit and the Act since May 21, 2009.

B. Failure to Develop and Implement an Adequate Monitoring and Reporting Program

Section B of the General Permit describes the monitoring requirements for storm water and non-storm water discharges. Facilities are required to make monthly visual observations of storm water discharges (Section B(4)) and quarterly visual observations of both unauthorized and authorized non-storm water discharges (Section B(3)). Section B(5) requires facility operators to sample and analyze at least two storm water discharges from all storm water discharge locations during each wet season. Section B(7) requires that the visual observations and samples must represent the "quality and quantity of the facility's storm water discharges from the storm event."

³ The rain dates are all the days when rain fell by comparing data from a weather station in Santa Monica, California, approximately 15 miles away from the Facility, and a weather station in Glendale, approximately 15 miles away from the Facility.
<http://www.ipm.ucdavis.edu/WEATHER/SITES/losangeles.html> (Last accessed on May 17, 2014). The rain dates on the attached table are when a daily average of 0.1" or more rain was observed.

The above-referenced data was obtained from the Facility's monitoring program as reported in its Annual Reports submitted to the Regional Board. This data is evidence that the Facility has violated various Discharge Prohibitions, Receiving Water Limitations, and Effluent Limitations in the General Permit. In addition, on May 31, 2012, the Facility reported to the Regional Board that it took storm water samples upgradient of the rusty metal outdoor storage area. To the extent the storm water data collected by Armorcast is not representative of the quality of the Facility's various storm water discharges and that the Facility failed to monitor all qualifying storm water discharges, CCAT alleges that the Facility's monitoring program violates Sections B(3), (4), (5) and (7) of the General Permit.

The Facility is required to analyze storm water samples for "pollutants that are likely to be present in storm water discharges in significant quantities" pursuant to Section B(5)(c)(ii) of the General Permit. CCAT also alleges that the Facility failed to sample and analyze storm water discharges for iron during the 2009-2010 and 2010-2011 wet seasons, as well as during the first storm water sample of the 2011-2012 wet season. As evidenced by Armorcast's recent sampling results, iron is likely to be present in the Facility's storm water discharges in significant quantities. This failure results in at least three violations of the General Permit.

The above violations are ongoing. Consistent with the five-year statute of limitations applicable to citizen enforcement actions brought pursuant to the federal Clean Water Act, Armorcast is subject to penalties for violations of the General Permit and the Act's monitoring and sampling requirements since May 21, 2009.

C. Failure to Prepare, Implement, Review and Update an Adequate Storm Water Pollution Prevention Plan

Section A and Provision E(2) of the General Permit require dischargers of storm water associated with industrial activity to develop, implement, and update an adequate storm water pollution prevention plan ("SWPPP") no later than October 1, 1992. Section A(1) and Provision E(2) requires dischargers who submitted an NOI pursuant to the General Permit to continue following their existing SWPPP and implement any necessary revisions to their SWPPP in a timely manner, but in any case, no later than August 1, 1997.

The SWPPP must, among other requirements, identify and evaluate sources of pollutants associated with industrial activities that may affect the quality of storm and non-storm water discharges from the facility and identify and implement site-specific best management practices ("BMPs") to reduce or prevent pollutants associated with industrial activities in storm water and authorized non-storm water discharges (General Permit, Section A(2)). The SWPPP must include BMPs that achieve BAT and BCT (Effluent Limitation B(3)). The SWPPP must include: a description of individuals and their responsibilities for developing and implementing the SWPPP (General Permit, Section A(3)); a site map showing the facility boundaries, storm water drainage areas with flow pattern and nearby water bodies, the location of the storm water collection, conveyance and discharge system, structural control measures, impervious areas, areas of actual and potential pollutant contact, and areas of industrial activity (General Permit,

Section A(4)); a list of significant materials handled and stored at the site (General Permit, Section A(5)); a description of potential pollutant sources including industrial processes, material handling and storage areas, dust and particulate generating activities, a description of significant spills and leaks, a list of all non-storm water discharges and their sources, and a description of locations where soil erosion may occur (General Permit, Section A(6)).

The SWPPP also must include an assessment of potential pollutant sources at the Facility and a description of the BMPs to be implemented at the Facility that will reduce or prevent pollutants in storm water discharges and authorized non-storm water discharges, including structural BMPs where non-structural BMPs are not effective (General Permit, Section A(7), (8)). The SWPPP must be evaluated to ensure effectiveness and must be revised where necessary (General Permit, Section A(9),(10)).

CCAT's review of the Facility's SWPPP and its investigation of the conditions at the Facility as well as Armorcat's Annual Reports indicate that Armorcast has been operating with an inadequately developed and implemented SWPPP in violation of the requirements set forth above. Armorcast has failed to evaluate the effectiveness of its BMPs and to revise its SWPPP as necessary. Armorcast has been in continuous violation of Section A and Provision E(2) of the General Permit every day since May 21, 2009, at the very latest, and will continue to be in violation every day that Armorcast fails to prepare, implement, review, and update an effective SWPPP. Armorcast is subject to penalties for violations of the Order and the Act occurring since May 21, 2009.

D. Failure to File True and Correct Annual Reports

Section B(14) of the General Permit requires dischargers to submit an Annual Report by July 1st of each year to the executive officer of the relevant Regional Board. The Annual Report must be signed and certified by an appropriate corporate officer. General Permit, Sections B(14), C(9), (10). Section A(9)(d) of the General Permit requires the discharger to include in their annual report an evaluation of their storm water controls, including certifying compliance with the General Permit. *See also* General Permit, Sections C(9) and (10) and B(14).

For the last five years, Armorcast and its agent, Ari Aleong, inaccurately certified in its Annual Reports that the Facility was in compliance with the General Permit. Consequently, Armorcast has violated Sections A(9)(d), B(14) and C(9) & (10) of the General Permit every time Armorcast failed to submit a complete or correct report and every time Armorcast or its agents falsely purported to comply with the Act. Armorcast is subject to penalties for violations of Section (C) of the General Permit and the Act occurring since at least July 7, 2010.

III. Persons Responsible for the Violations.

CCAT puts Armorcast on notice that they are the persons responsible for the violations described above. If additional persons are subsequently identified as also being responsible for

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the violations set forth above, CCAT puts Armorcast on notice that it intends to include those persons in this action.

IV. Name and Address of Noticing Parties.

The name, address and telephone number of CCAT is as follows:

Jane Williams
Executive Director
California Communities Against Toxics
P.O. Box 845
Rosamond, CA 93560
Tel. (661) 510-3412

V. Counsel.

CCAT has retained counsel to represent it in this matter. Please direct all communications to:

Michael R. Lozeau
Douglas J. Chermak
Lozeau Drury LLP
410 12th Street, Suite 250
Oakland, California 94607
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michael@lozeaudrury.com
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Los Angeles, CA 90017
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VI. Penalties.

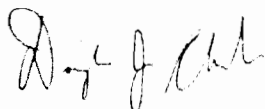
Pursuant to Section 309(d) of the Act (33 U.S.C. § 1319(d)) and the Adjustment of Civil Monetary Penalties for Inflation (40 C.F.R. § 19.4) each separate violation of the Act subjects Armorcast to a penalty of up to \$37,500 per day per violation. In addition to civil penalties, CCAT will seek injunctive relief preventing further violations of the Act pursuant to Sections 505(a) and (d) (33 U.S.C. § 1365(a) and (d)) and such other relief as permitted by law. Lastly, Section 505(d) of the Act (33 U.S.C. § 1365(d)), permits prevailing parties to recover costs and fees, including attorneys' fees.

CCAT believes this Notice of Violations and Intent to File Suit sufficiently states grounds for filing suit. CCAT intends to file a citizen suit under Section 505(a) of the Act against Armorcast and its agents for the above-referenced violations upon the expiration of the 60-day notice period. However, during the 60-day notice period, CCAT would be willing to discuss effective remedies for the violations noted in this letter. If you wish to pursue such discussions in the absence of litigation, CCAT suggests that you initiate those discussions within

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the next 20 days so that they may be completed before the end of the 60-day notice period. CCAT does not intend to delay the filing of a complaint in federal court if discussions are continuing when that period ends.

Sincerely,



Douglas J. Chermak
Lozeau Drury LLP
Attorneys for California Communities Against Toxics

cc via first class mail: Mr. Paul Boghossian
Agent for Service of Process for Armorcast Products Company, Inc.
(Entity No. C0960520)
4694 Brewster Drive
Tarzana, CA 91356

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SERVICE LIST

Gina McCarthy, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Thomas Howard, Executive Director
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Eric Holder, U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, DC 20530-0001

Jared Blumenfeld, Regional Administrator
U.S. EPA – Region 9
75 Hawthorne Street
San Francisco, CA, 94105

Samuel Unger, Executive Officer
Los Angeles Regional Water Quality Control Board
320 West Fourth Street, Suite 200
Los Angeles, CA 90013

ATTCHMENT A

Rain Dates, Armorcast Products Company, Inc., North Hollywood, Los Angeles County, California

10/13/2009	10/30/2010	5/18/2011
10/14/2009	11/8/2010	10/5/2011
12/7/2009	11/20/2010	11/4/2011
12/10/2009	11/21/2010	11/6/2011
12/11/2009	11/22/2010	11/12/2011
12/12/2009	11/23/2010	11/20/2011
12/13/2009	11/24/2010	12/12/2011
12/30/2009	11/25/2010	12/13/2011
1/13/2010	11/26/2010	1/21/2012
1/17/2010	11/27/2010	1/23/2012
1/18/2010	12/5/2010	2/27/2012
1/19/2010	12/17/2010	3/17/2012
1/20/2010	12/18/2010	3/18/2012
1/21/2010	12/19/2010	3/25/2012
1/22/2010	12/20/2010	3/31/2012
1/26/2010	12/21/2010	4/10/2012
2/5/2010	12/22/2010	4/11/2012
2/6/2010	12/25/2010	4/13/2012
2/9/2010	12/26/2010	4/25/2012
2/19/2010	12/29/2010	10/11/2012
2/27/2010	1/2/2011	11/17/2012
3/3/2010	1/3/2011	11/29/2012
3/4/2010	1/30/2011	11/30/2012
3/6/2010	2/16/2011	12/1/2012
4/4/2010	2/18/2011	12/2/2012
4/5/2010	2/19/2011	12/3/2012
4/11/2010	2/25/2011	12/12/2012
4/12/2010	2/26/2011	12/13/2012
4/20/2010	3/2/2011	12/14/2012
4/28/2010	3/3/2011	12/16/2012
10/6/2010	3/19/2011	12/18/2012
10/17/2010	3/20/2011	12/24/2012
10/18/2010	3/21/2011	12/26/2012
10/19/2010	3/23/2011	12/29/2012
10/20/2010	3/24/2011	1/24/2013
10/21/2010	3/25/2011	1/25/2013
10/22/2010	3/27/2011	2/19/2013
10/24/2010	5/15/2011	3/7/2013
10/25/2010	5/17/2011	3/8/2013

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ATTCHMENT A

Rain Dates, Armorcast Products Company, Inc., North Hollywood, Los Angeles County,
California

3/9/2013	10/9/2013	3/1/2014
4/14/2013	11/29/2013	3/5/2014
4/15/2013	12/19/2013	4/1/2014
5/6/2013	12/20/2013	4/2/2014
7/11/2013	2/6/2014	
8/6/2013	2/28/2014	

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